

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED:
v.	:	CRIMINAL NUMBER
TIERENEY BROWN	:	Charges: 18 U.S.C. § 1344 (bank
a/k/a Tiereney Moon Brown	:	fraud) - 7 counts;
a/k/a Tiereney Moon	:	42 U.S.C. § 408(a)(7)(B) (using social
	:	security number with intent to defraud)
	:	- 20 counts

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES:

1. At all times material to this Information, the defendant TIERENEY BROWN resided at 7900 Stenton Avenue, Philadelphia, PA or at 2047 E. Rittenhouse Street, Philadelphia, PA 19138 or with her mother at 20 Fawn Court, Limerick, PA.
2. From 1997 through 2002, the defendant TIERENEY BROWN executed various schemes to defraud financial institutions.
3. It was part of these schemes that the defendant TIERENEY BROWN opened bank accounts and borrowed money from financial institutions and misrepresented her credit history by using the social security numbers of other persons on her applications. As a result, financial institutions did not obtain an accurate picture of the defendant's credit history.
4. It was further part of these schemes that, after obtaining the money, the defendant TIERENEY BROWN defaulted on the loans.

5. It was further part of these schemes that the defendant TIERENEY BROWN deposited checks drawn on insufficient funds and on closed accounts into her bank accounts and attempted to withdraw the funds before the financial institutions learned that the deposited checks were not good.

Commerce Bank

6. At all times material to this Information, Commerce Bank was a financial institution with funds insured by the Federal Deposit Insurance Corporation and it was a member of the Federal Reserve Bank. As such Commerce Bank was a financial institution, as that term is defined in Title 18, United States Code, Section 20.

7. From on or about December 8, 1997 until on or about August 14, 2000, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

**TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon**

knowingly executed and attempted to execute a scheme to defraud Commerce Bank.

Account 460229784

8. It was part of the scheme that on or about December 8, 1997, the defendant TIERENEY BROWN opened a checking account at Commerce Bank in her own name, using the social security number of TRM. She gave an address of 7900C Stenton Avenue, Apartment 208 Philadelphia, PA. The account was given the number 460229784.

9. On or about December 8 and December 9, 1997, the defendant TIERENEY BROWN deposited two checks, each in the amount of \$700, into this Commerce Bank account.

These checks were drawn on a closed account belonging to the defendant TIERENEY BROWN at First Union Bank.

10. Before Commerce learned that the deposited checks were dishonored by First Union Bank, the defendant, TIERENEY BROWN withdrew funds from the Commerce Bank account.

11. On or about December 9, 1997, the defendant TIERENEY BROWN withdrew \$650 from the Commerce Bank account.

12. On or about December 10, 1997, the defendant TIERENEY BROWN withdrew \$700 from the Commerce Bank account.

13. As a result of this conduct, Commerce Bank suffered a loss of approximately \$1350.00.

Account Number 360419541

14. On or about December 9, 1997, the defendant TIERENEY BROWN opened an account at Commerce Bank in her own name. She used a social security number that was the same as the one assigned to her minor son, except for the last digit. The account was given number 360419541. She gave her address as 2047 E. Rittenhouse Street, Philadelphia, PA.

15. On or about March 3, 1998, the defendant TIERENEY BROWN deposited a check drawn on her account at American Heritage Federal Credit Union in the amount of \$1800.00.

16. On or about March 4, 1998, the defendant TIERENEY BROWN deposited a check drawn on her account at American Heritage Federal Credit Union in the amount of \$1727.

17. Both of these checks were dishonored by American Heritage because there were not sufficient funds in the account to cover the checks.

18. Between on or about March 4, 1998 and March 6, 1998, the defendant TIERENEY BROWN charged items to this account at stores such as Bloomingdale's, Head Start Shoes, and 9 West resulting in an overdraft on this account of more than \$1500.00.

Account Number 360381263

19. On or about September 22, 1998, the defendant TIERENEY BROWN opened an account at Commerce Bank in her own name, using the social security number of TGM. She gave as her address 20 Fawn Court, Limerick, PA. The account was given number 360381263.

20. On or about December 30, 1998, the defendant TIERENEY BROWN deposited a check in the amount of \$764.00, drawn on the account of Tiereney M. Moon, 2047 E. Rittenhouse Street, Philadelphia PA, at PNC bank, into this account.

21. On or about January 6, 1999, the defendant TIERENEY BROWN deposited a check in the amount of \$1527.00, on the account of Tiereney M. Moon, 2047 E. Rittenhouse Street, Philadelphia PA, at PNC bank, into this account.

22. Both checks were dishonored because the account on which they were drawn was closed.

23. Between the time that the checks were deposited and the time that Commerce Bank learned that they had been dishonored, the defendant TIERENEY BROWN made cash withdrawals at automated teller machines (ATMs) and used her bank card for point of sale purchases, causing a loss to the bank of approximately \$1400.00.

The custodial account for her minor son

24. On or about July 17, 1998, the defendant TIERENEY BROWN opened a trust account for her minor son at Commerce Bank, using the social security number of BB in place of her own and using an incorrect social security number in place of that of her minor son. The account was assigned number 12859856.

25. Between July 21 and July 23, 1998, the defendant TIERENEY BROWN cashed three checks at Commerce and deposited a fourth into this account. All of the checks were drawn on the account of Tiereney M. Brown at Philadelphia Telco Credit Union. She endorsed these checks with her own name and placed the account number 12859856 on the endorsement to induce the bank to cash them. Three of these checks were in the amount of \$700.00 and the fourth was in the amount of \$900.00. The total amount of these checks was \$3,000.00. All the checks were returned for insufficient funds.

Account Number 361003684/Account Number 361199326

26. On or about November 12, 1999, the defendant TIERENEY BROWN opened an account at Commerce Bank in her name, using the social security number of MB. She gave her address as 2047 E. Rittenhouse Street, Philadelphia, PA. The account was assigned number 361003684.

27. On or about July 19, 2000, the defendant TIERENEY BROWN closed this account and opened a new one, using the same identifying information. The account was assigned number 361199326.

28. On or about August 11, 2000, the defendant TIERENEY BROWN deposited a check in the amount of \$3227.11 from a closed account in the name of TL at First Union Bank.

29. On or about August 14, 2000, the defendant TIERENEY BROWN deposited a check in the amount of \$2,200.00 from a closed account in the name of TL at First Union Bank.

30. After making these deposits, the defendant TIERENEY M. BROWN made additional ATM withdrawals and debit card purchases totaling approximately \$7500.00 before Commerce Bank learned that the deposited checks were not good.

31. At the time of these deposits, this account was overdrawn as a result of previously written checks and debit card purchases resulting in a loss to Commerce Bank.

Account Number 361310709

32. On or about October 5, 2000, the defendant TIERENEY BROWN opened an account at Commerce Bank in her own name, using the social security number of KLH. She gave her address as 2047 E. Rittenhouse Street, Philadelphia, PA. The account was assigned number 361310709.

33. Between December 4 and December 8, 2000, five checks drawn on the closed account of Tiereney M. Brown at Philadelphia Telco Credit Union were deposited into this account. The checks were for the sums of \$400.00, \$700.00, \$750.00, \$898.00 and \$700.00 respectively, totaling \$3448.00.

34. These deposits were meant to cover checks and withdrawals which had already been written and executed. The dishonoring of the five checks caused a loss to Commerce Bank of approximately \$1714.90.

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, the Philadelphia Federal Credit Union was a credit union with accounts insured by the National Credit Union Share Insurance Fund and as such, it was a financial institution as defined in Title 18, United States Code, Section 20.
3. From on or about July 1, 1998 until on or about June 2, 1999, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud Philadelphia Federal Credit Union.

Account Number 635608

4. On or about July 1, 1998, the defendant TIERENEY BROWN opened account number 635608 at Philadelphia Federal Credit Union, using her address of 2047 E. Rittenhouse Street, Philadelphia, PA and using the social security number of AMS.
5. On or about the following dates, the defendant TIERENEY BROWN deposited the following checks drawn on insufficient funds into account 635608:

DATE	BANK DRAWN ON	ACCOUNT HOLDER	AMOUNT
07/13/98	PNC	Tiereney Moon	\$550.00
07/14/98	Philadelphia Telco Credit Union	Tiereney M. Brown	\$1,400.00

07/14/98	Philadelphia Telco Credit Union	Tierney M. Brown	\$500.00
07/14/98	Philadelphia Telco Credit Union	Tierney M. Brown	<u>\$500.00</u>
TOTAL			\$2,950.00

6. The check for \$1400 and one of the checks for \$500 were made as split deposits and the defendant TIERENEY M. BROWN took \$100 in cash at the time of making each of these deposits.

7. Between July 13, 1998 and July 16, 1998, before Philadelphia Federal Credit Union learned that the deposited checks were dishonored, the defendant TIERENEY BROWN withdrew \$751.50 through payments and ATM withdrawals from this account. As a result of these actions, the defendant TIERENEY BROWN caused the Philadelphia Federal Credit Union to lose \$751.50.

Account Number 645395

8. On or about April 14, 1999, the defendant TIERENEY BROWN opened account number 645395 at Philadelphia Federal Credit Union, using her mother's address of 20 Fawn Court, Limerick, PA and the social security number of CLS.

9. On or about the following dates, the defendant TIERENEY BROWN deposited the following checks drawn on insufficient funds into account 645395:

DATE	BANK DRAWN ON	ACCOUNT HOLDER	AMOUNT
05/25/99	PNC	Tierney M. Brown	\$420.00
05/28/99	Commerce	Tierney Moon	\$547.12
06/02/99	Commerce	Tierney Moon	\$700.00

06/04/99	PNC	Tierney Brown	\$457.32
06/04/99	Commerce	Tierney Moon	\$470.00
06/08/99	Commerce	Tierney M. Brown	<u>\$382.43</u>
TOTAL			\$2,976.87

10. Each of these checks was dishonored by drawee bank because of insufficient funds. Except for the check for \$420.00, the defendant split deposit each of these checks and took a total of \$1272.00 in cash.

11. Between on or about May 26, 1999 and on or about June 2, 1999, the defendant TIERNEY BROWN withdrew the sum of \$1555.69 from this account at Philadelphia Federal Credit Union, resulting in a loss to the credit union.

All in violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES that:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, First Union was a financial institution with funds insured by the Federal Deposit Insurance Corporation and it was a member of the Federal Reserve Bank. As such First Union was a financial institution, as that term is defined in Title 18, United States Code, Section 20.
3. From on or about August 9, 2000, until on or about November 26, 2001, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud First Union.

Account 1010037895390

4. On or about August 9, 2000, the defendant TIERENEY BROWN opened a checking account at First Union, using the name JKB and social security number of JKB. She gave her home address of 2047 E. Rittenhouse St., Philadelphia, PA. The account was assigned number 1010037895390.
5. On or about each of the dates listed below, the defendant TIERENEY BROWN deposited checks drawn on the account of SF at Commerce Bank.

<u>DATE</u>	<u>AMOUNT</u>
08/09/00	\$1,273.27
08/10/00	\$729.31
08/10/00	<u>\$847.00</u>
TOTAL	\$2,849.58

6. Each of these checks was returned because of insufficient funds.

7. On or about October 19, 2000, First Union closed this account

The Auto Loan

8. On or about December 1, 2000, the defendant TIERENEY BROWN applied to First Union for an automobile loan. Instead of her own social security number, she placed the social security number of TB on the application.

9. First Union lent the defendant TIERENEY BROWN \$22,740 for the purchase of an automobile and took a security interest in the vehicle. The defendant made two payments on the loan and defaulted, resulting the repossession of the vehicle and the loss to First Union of \$3,994.00.

The Loan Using the Name of MVD

10. On or about November 23, 2001, the defendant TIERENEY BROWN sent an application by fax machine to First Union for a loan in the amount of \$7,000.00. She used the name MVD and the social security number of MVD of New York, NY, but used her own home address on the application.

11. On or about November 23, 2001 First Union approved the loan and issued a check in the amount of \$7,000.00 to MVD, 2047 E. Rittenhouse Street, Philadelphia, PA.

12. On or about November 26, 2001 the First Union check in the amount of \$7,000.00 described in paragraph 11, was deposited into an Account No. 9446817956, belonging to the defendant TIERENEY BROWN at Fleet National Bank.

13. No payments were made on this loan and it resulted in loss to First Union of \$7,000.00.

All in violation of Title 18, United States Code, Section 1344.

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, Mellon Bank was a financial institution with funds insured by the Federal Deposit Insurance Corporation and it was a member of the Federal Reserve Bank. As such Mellon Bank was a financial institution, as that term is defined in Title 18, United States Code, Section 20.
3. From on or about May 1, 2001 until on or about August 6, 2001, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud Mellon Bank.

4. It was part of the scheme that on or about May 1, 2001, the defendant TIERENEY BROWN opened a checking account at Mellon Bank. She used the social security number of TB as her own. The account was assigned account number 001-068-4108.
5. On or about each of the dates listed below, the defendant TIERENEY BROWN conducted transactions on her account at Mellon Bank. Each of the deposits was made with a check drawn on the account of TL at First Union Bank, which account was closed. This was the same account as was described in Count One, Paragraphs 28, 29.

<u>DATE</u>	<u>TYPE TRANSACTION</u>	<u>AMOUNT</u>
08/02/01	Deposit	\$787.92

<u>DATE</u>	<u>TYPE TRANSACTION</u>	<u>AMOUNT</u>
08/03/01	Deposit	\$977.22
08/03/01	Withdrawal	(\$500.00)
08/03/01	Withdrawal	(\$300.00)
08/06/01	Deposit	\$1,700.00
08/06/01	Withdrawal	(\$85.00)
08/06/01	Withdrawal	(\$301.50)
08/06/01	Withdrawal	(\$300.50)
08/06/01	Withdrawal	(\$300.00)

6. As a result of these acts, Mellon lost \$1,780.00.

All in violation of Title 18, United States Code, Section 1344.

COUNT FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, Sovereign Bank was a financial institution with funds insured by the Federal Deposit Insurance Corporation and it was a member of the Federal Reserve Bank. As such Sovereign Bank was a financial institution, as that term is defined in Title 18, United States Code, Section 20.
3. From on or about August 11, 2000 until on or about October 15, 2002, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank.

Account Number 2361023350

4. It was part of the scheme that on or about August 11, 2000, the defendant TIERENEY BROWN opened checking account number 2361023350 at Sovereign Bank. She used her address of 2047 E. Rittenhouse St., Philadelphia, PA 19138 and the social security number of KLH to open the account
5. On or about September 11, 2000, the defendant TIERENEY BROWN deposited a check into the Sovereign Bank account, drawn on the account of JKB at First Union Bank, in the amount of \$175.00. The account number on this check was the same as the account opened

at First Union referred to in Paragraph 4 of Count Three. The check was dishonored by First Union because the account had a negative balance.

6. On or about October 3, 2000, the defendant TIERENEY BROWN deposited a check in the amount of \$700.00, into the Sovereign Bank account, drawn on the same JKB account. The check was dishonored by First Union because the account had a negative balance.

7. On or about October 4, 2000, the defendant TIERENEY BROWN deposited a check in the amount of \$647.00 into the Sovereign Bank account, drawn on the account of SF at Commerce Bank. The check was dishonored because the account was closed.

8. On or about October 5, 2000, the defendant TIERENEY BROWN deposited a check in the amount of \$700.00 into the Sovereign Bank account, drawn on the account of SF at Commerce Bank. The check was dishonored because the account was closed.

9. On or about October 5, 2000, the defendant TIERENEY BROWN withdrew \$1,000.00 from her Sovereign Bank account, in two transactions, one for \$300.00 and one for \$700.00.

10. Between the time of the deposits and the return of the dishonored checks, the defendant TIERENEY BROWN made several cash withdrawals from ATMs and purchased items at stores using a Sovereign Bank card, all resulting in a loss to Sovereign Bank of approximately \$2,070.34.

Account Number 2043019154 in the name of her minor son

11. It was part of the scheme that on or about August 18, 2000, the defendant TIERENEY BROWN opened account number 2043010954 at Sovereign Bank in the name of her minor son.

12. It was part of the scheme that on or about on each of the dates listed below, the defendant TIERENEY BROWN conducted the following transactions at Sovereign Bank.

<u>DATE</u>	<u>TYPE TRANSACTION</u>	<u>CHECK NO.</u>	<u>AMOUNT</u>
09/16/02	DEPOSIT	1077	\$700.00
09/17/02	DEPOSIT	1079	\$2,700.00
09/17/02	WITHDRAWAL		(\$650.00)
09/18/02	DEPOSIT	1084	\$1,200.00
09/18/02	WITHDRAWAL		(\$800.00)
09/19/02	DEPOSIT	1087	\$1,700.00
09/19/02	WITHDRAWAL		(\$2,600.00)
09/20/02	WITHDRAWAL		(\$50.00)
09/20/02	WITHDRAWAL		(\$1,240.00)
09/21/02	WITHDRAWAL		(\$250.00)

13. All of the deposited checks were drawn on account number 9446817956, in the name of TIERENEY M. BROWN, at Fleet Bank. This is the same account into which the loan check to MVD, referred to in Paragraph 12, Count Three of this Information, was deposited. All of these checks were dishonored by Fleet Bank.

14. As a result of these transactions, Sovereign Bank suffered a loss of approximately \$6,390.00

All in violation of Title 18, United States Code, Section 1344.

COUNT SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, the Pennsylvania State Employees Credit Union was a credit union with accounts insured by the National Credit Union Share Insurance Fund and as such, it was a financial institution as defined in Title 18, United States Code, Section 20.
3. From on or about April 26, 2001, until on or about September 19, 2001, at Philadelphia, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud the Pennsylvania State Employees Credit Union ("PSECU").

The Automobile Loan

4. On or about April 19, 2001, the defendant TIERENEY BROWN applied for a loan of \$25,000.00 to purchase a Mitsubishi Mirage automobile. She gave her address as 20 Fawn Court, Limerick, PA and listed her mother as a co-applicant. She used the social security number of KLH in place of her own and used the social security number of CSB in place of her mother's.
5. When PSECU learned that the credit history submitted was fraudulent because of the use of other persons' social security numbers, it repossessed the vehicle and resold it.
6. As a result of this conduct, PSECU lost approximately \$12,168.

The Personal Services Loan

7. On or about April 25, 2001, the defendant TIERENEY BROWN applied for a personal services loan of \$7,000.00. She used her mother's address of 20 Fawn Court, Limerick, PA and listed her mother as the co-applicant. She used the social security number of KLH in place of her own and used the social security number of CSB in place of her mother's.

8. On or about May 7, 2001, PSECU issued a loan check in the amount of \$3,000.00 to Tiereney Moon Brown or CSB.

9. On or about May 10, 2001, the defendant TIERENEY BROWN deposited this check into her account at First Union.

10. On or about May 16, 2001, PSECU issued a loan check in the amount of \$3,000.00 to Tiereney Moon Brown or Carolyn Brown.

11. On or about May 23, 2001, the defendant TIERENEY BROWN deposited this check into her account at First Union.

12. On or about June 28, 2001, July 13, 2001 and July 26, 2001 the defendant TIERENEY BROWN made valid payments of \$20.00, \$120.00 and \$60.00 respectively on this account

13. On or about July 27, 2001, the defendant TIERENEY BROWN presented to PSECU a check drawn on the closed account of TL at First Union Bank in the sum of \$2,000.00 in payment of this loan.

14. As a result of this PSECU suffered a loss of approximately \$5983.00.

Custodial Account for her minor son

15. On or about June 28, 2001, the defendant TIERENEY BROWN opened an account for her minor son at PSECU. She gave her address as 20 Fawn Court, Limerick, PA and used the social security number of KLH in place of her own.

16. On or about each of the dates listed below, the defendant TIERENEY BROWN conducted the transactions listed below in this account. All of the deposited checks were drawn upon a closed account at Mellon Bank in the name of Tiereney Brown and were dishonored. This was the same Mellon Bank account referred to in Count Four of this Information. All of the withdrawals and purchases were made before PSECU realized that the deposited checks were not good.

<u>DATE</u>	<u>TIME</u>	<u>AMOUNT DEPOSITED</u>	<u>AMOUNT WITH- DRAWN</u>	<u>MAKER OF CHECK</u>	<u>COMMENTS</u>
09/13/01	15:41:30	\$ 700.00		Tiereney Brown	ATM
09/13/01	15:42:12		\$ 400.00		ATM
09/14/01	08:48:59		\$ 300.00		ATM
09/14/01	08:56:40	\$ 800.00		Tiereney Brown	ATM
09/14/01	08:57:03		\$ 200.00		ATM
09/15/01	12:04:06		\$ 500.00		ATM
09/15/01	16:08:09		\$ 263.50		Attempted point of sale transaction
09/16/01	16:35:48		\$ 200.00		Attempted with- drawal
09/16/01	16:36:19		\$ 100.00		ATM

<u>DATE</u>	<u>TIME</u>	<u>AMOUNT DEPOSITED</u>	<u>AMOUNT WITH- DRAWN</u>	<u>MAKER OF CHECK</u>	<u>COMMENTS</u>
09/16/01	17:19:05	\$ 970.00		Tiereny Brown	ATM
09/16/01	17:19:27		\$ 400.00		ATM
09/17/01	16:31:08		\$ 500.00		ATM
09/18/01	09:06:53	\$ 900.00		Tiereny Brown	ATM
09/18/01	09:07:18		\$ 500.00		ATM
09/19/01	08:23:51	_____	<u>\$ 460.00</u>		ATM
TOTAL		\$ 3,370.00	\$ 2,860.00		

17. As a result of these acts, PSECU lost approximately \$3352.00.

Account Number 8502339685

18. It was further part of the scheme that on or about September 16, 2002, defendant TIERENEY BROWN opened another account at PSECU. She used the name “Tiaereney M. Brown” and gave her home address of 2047 E. Rittenhouse St., Philadelphia, PA. She used a social security number that was the same as that of her son, except for the last digit.

19. On or about the following dates, the defendant TIERENEY BROWN deposited the following checks into this PSECU account. The checks were drawn on the account of Tiaereney M. Brown, 20 Fawn Court, Limerick, PA at the American Heritage Federal Credit Union. The checks were dishonored by American Heritage for lack of sufficient funds.

<u>DATE</u>	<u>CHECK NUMBER</u>	<u>AMOUNT</u>
11/01/2002	101	\$200.00
11/04/2002	102	\$640.00

20. At the time of these deposits, this account was overdrawn as a result of previously written checks and debit card purchases. The defendant TIERENEY BROWN continued to make ATM withdrawals and debit card purchases resulting in a loss to PSECU of approximately \$491.96

21. When a representative of PSECU contacted the defendant TIERENEY BROWN about the overdrafts, she faxed a letter to PSECU asserting that she was a different person from the one who had previously defrauded the bank and faxed with her letter a copy of a counterfeit identification card from Arcadia University, asserting that she was a student at Arcadia.

All in violation of Title 18, United States Code, Section 1344.

COUNT SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. Paragraphs 1 through 5 of Count One are incorporated by reference.
2. At all times material to this Information, Harleysville National Bank was a financial institution with funds insured by the Federal Deposit Insurance Corporation and it was a member of the Federal Reserve Bank. As such Harleysville National Bank was a financial institution, as that term is defined in Title 18, United States Code, Section 20.
3. At all times material to this Information, the Freedom Credit Union was a credit union with accounts insured by the National Credit Union Share Insurance Fund and as such, it was a financial institution as defined in Title 18, United States Code, Section 20.
4. From on or about July 30, 2003, until on or about August 15, 2003, at Lower Salford Township and at Horsham Township, in the Eastern District of Pennsylvania, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

knowingly executed and attempted to execute a scheme to defraud the Harleysville National Bank and the Freedom Credit Union.

5. On or about May 12, 2003, the defendant TIERENEY BROWN opened a bank account at Harleysville National Bank. She gave her address as 20 Fawn Court, Limerick, PA and used the social security number of TAG in place of her own.

6. On or about each of the dates listed below, the defendant TIERENEY BROWN deposited the following checks into the Harleysville account using automated teller machines. Each of these checks was drawn upon an account at Freedom Credit Union in the name of the defendant TIERENEY BROWN. Each of the checks was returned for insufficient funds.

<u>DATE</u>	<u>CHECK NUMBER</u>	<u>AMOUNT</u>
07/30/2003	115	\$1,793.93
07/31/2003	116	\$369.69
08/01/2003	117	\$1,856.00
08/02/2003	118	<u>\$2,343.90</u>
TOTAL		\$6,363.52

7. The defendant TIERENEY BROWN then wrote checks on this account before Harleysville National Bank discovered that the checks which had been deposited were not good.

8. On or about August 7, 2003, the defendant TIERENEY BROWN cashed a check drawn on the Harleysville National Bank at the Harleysville branch in Horsham, PA. The check was for the sum of \$3,000.00.

9. As a result of this conduct, Harleysville National Bank suffered a loss of approximately \$3,586.23 and Freedom Credit Union suffered a loss of approximately \$640.30.

All in violation of Title 18, United States Code, Section 1344.

COUNTS EIGHT THROUGH TWENTY-SIX

THE UNITED STATES ATTORNEY FURTHER CHARGES that:

On or about each of the dates listed below, (each date constituting a separate count of this Information) in the Eastern District of Pennsylvania and elsewhere, for the purpose of obtaining things of value and for other purposes, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

with intent to deceive, falsely represented a number to be the social security account number assigned to her by the Commissioner of Social Security, when in fact the number was not the number assigned to her by the Commissioner of Social Security and was, in fact, assigned to another person.

<u>COUNT</u>	<u>DATE</u>	<u>PERSON TO WHOM REPRESENTATION WAS MADE</u>	<u>PERSON TO WHOM SOCIAL SECURITY NUMBER WAS ASSIGNED</u>
8	04/14/1999	Philadelphia Federal Credit Union	CLS
9	04/21/1999	First Union	TLM
10	05/31/1999	First Union	CSD
11	11/12/1999	Commerce Bank	MB
12	08/09/2000	First Union	JKB
13	08/11/2000	Sovereign Bank	KLH
14	08/20/2000	PSECU	KLH
15	10/05/2000	Commerce Bank	KLH
16	12/01/2000	First Union	TB
17	12/31/2000	Commerce	TB

<u>COUNT</u>	<u>DATE</u>	<u>PERSON TO WHOM REPRESENTATION WAS MADE</u>	<u>PERSON TO WHOM SOCIAL SECURITY NUMBER WAS ASSIGNED</u>
18	04/19/2001	PSECU	KLH
19	04/19/2001	PSECU	CSB
20	04/25/2001	PSECU	KLH
21	04/25/2001	PSECU	CSB
22	04/25/2001	Cherry Hill Mitsubishi	AMS
23	05/01/2001	Mellon Bank	TB
24	07/03/2001	PSECU	KLH
25	11/23/2001	First Union	MVD
26	05/12/2003	Harleysville National Bank	TAG

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT TWENTY-SEVEN

THE UNITED STATES ATTORNEY FURTHER CHARGES:

1. On or about September 25, 2002, the defendant TIERENEY BROWN submitted a loan application to borrow money from the American General Consumer Discount Company, in Cheltenham, PA.

2. On the application, the defendant TIERENEY BROWN listed the social security number of TB in place of her own social security number

3. As a result of using TB's social security number, the American General Consumer Discount Company did not obtain an accurate picture of the defendant's credit history.

4. On or about September 26, 2002, the defendant TIERENEY BROWN obtained a loan from the American General Consumer Discount Company in the amount of \$4,040.36.

5. On or about September 25, 2002, at Cheltenham, in the Eastern District of Pennsylvania, for the purpose of obtaining things of value and for other purposes, the defendant

TIERENEY BROWN
a/k/a Tiereney Moon Brown
a/k/a Tiereney Moon

with intent to deceive, falsely represented, to the American General Consumer Discount Company, a number to be the social security account number assigned to her by the Commis-

sioner of Social Security, when in fact the number was not the number assigned to her by the Commissioner of Social Security and was, in fact, assigned to another person.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

PATRICK L. MEEHAN
United States Attorney